DECLARATION OF JULIAN KRANZ ISO GOOGLE LLC'S MOTION FOR RELIEF RE PRESERVATION

Redacted Version of Document Sought to be Sealed

1

UNITED STATES DISTRICT COURT

2

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

3

4 CHASOM BROWN, et al., on behalf of
themselves and all others similarly situated,

5   Plaintiffs,   Case No. 4:20-cv-03664-YGR-SVK

6   vs.

7 GOOGLE LLC,

8   Defendant.

9 PATRICK CALHOUN, et al., on behalf of
themselves and all others similarly situated,

10

11   Plaintiffs,   Case No. 4:20-cv-05146-YGR-SVK

12   vs.

13 GOOGLE LLC,

14   Defendant.

15

16

DECLARATION OF JULIAN KRANZ

17   1.   I am a Software Engineer at Google in Munich, Germany. I have been employed at

18 Google since 2019. As a result of my role and responsibilities, I am familiar with Google's data

19 logging systems as they relate to Chrome sync. Except where otherwise indicated, I make this

20 declaration based on my own personal knowledge and could competently testify thereto.

21   2.   I understand the Court issued preservation orders in the above-captioned cases

22 requiring that Google preserve data in ▮▮▮▮▮▮ traffic logs, among other data sources. I understand

23 that the Court has ordered a daily "sample" preservation of data for 10,000 U.S.-based users in ▮▮▮

24 ▮▮ traffic logs for the *Brown* and *Calhoun* cases, and a "full ongoing preservation" of specific

25 fields for U.S.-based user activity from these ▮▮▮▮▮▮ traffic log sources for the *Calhoun* case.

26   3.   To comply with the preservation orders, I worked on this task for the past several

27 months. Although I did not track the hours I worked on this project at the time, my best estimate is

28 that I spent at least ▮▮ hours designing, scoping, configuring, implementing, testing, optimizing,

;

.

1 debugging, and verifying the sampling and field-based preservation pipelines for the ███████

2 traffic logs. Going forward, those pipelines will require monitoring, maintenance, and debugging,

3 which I estimate will take on average ██ hours per week.

4   4.   As of October 13, 2022, the aforementioned sampling preservation pipelines store

5 about ████████ of data, and the compressed daily average of new data written to the pipelines is

6 around ████████; the field-based preservation pipelines store about ████████ of data, and

7 the compressed daily average of new data written to the pipelines is around ████████.

8

9   I declare under penalty of perjury under the laws of the United States of America that the

10 foregoing is true and correct.

11   Executed on the 17th day of October 2022 at Munich, Germany.

12

13 By: *Julian Kranz*

14   Julian Kranz

15

16

17

18

19

20

21

22

23

24

25

26

27

28